

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

WOLLMUTH MAHER & DEUTSCH LLP

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(Admitted *pro hac vice*)

ATTORNEYS FOR DEBTOR

In re:

LTL MANAGEMENT LLC,¹

Debtor.

Chapter 11

Case No.: 21-30589 (MBK)

RETENTION QUESTIONNAIRE

Do not file this Questionnaire with the Court. Please return it to:

Jones Day

Attn: Dan B. Prieto, Esq.

Amanda Rush, Esq.

2727 North Harwood Street, Suite 500, Dallas, Texas 75201

dbprieto@jonesday.com

asrush@jonesday.com

¹

The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

and

Jones Day

Attn: Isel M. Perez

600 Brickell Avenue, Suite 3300, Miami, Florida 33131

iperez@jonesday.com

1. Name and Address of Firm:

Schwabe, Williamson & Wyatt
1211 SW Fifth Avenue, Suite 1900
Portland, OR 97204

2. Date of retention:

October 14, 2021

3. Type of services to be provided:

Litigation advice and services related to pending personal injury claims arising from the alleged use of talc-containing products manufactured, distributed, marketed, and/or sold by the Debtor.

4. Brief description of services to be provided:

Monitor case dockets and assist with matters related to enforcing the automatic stay and, to the extent necessary and permitted by order of this Court, services would also include the evaluation of pending and future talc personal injury and consumer claims under the relative substantive law, the conduct of discovery on those claims (including fact and written discovery), the preparation of briefs and other pleadings related to the merits of the underlying claims, the preparation of expert witnesses and discovery-related thereto, the trial of remaining factual issues upon the conclusion of discovery, and merits briefing and other related litigation services as the Debtor may require.

5. Arrangements for compensation (hourly, contingent, etc.)

The Firm bills hourly rates for its services (in one-tenth hour increments) and will also seek reimbursement of costs and expenses.

(a) Average hourly rate (if applicable):

Paralegals: \$215

Associates: \$280 - \$325

Shareholder: \$390 - \$450

(b) Estimated average monthly compensation based on prepetition retention (if firm was employed prepetition):

The Firm's average monthly compensation in the year preceding Debtor's petition was approximately \$1,250.00.

6. Prepetition claims against the Debtor held by the firm:

\$30,495.00²

7. Prepetition claims against the Debtor held individually by any member, associate, or professional employee of the company:

None.

8. Disclose the nature and provide a brief description of any interest adverse to the Debtor or to its estates for the matters on which the firm is to be employed:

The Firm does not have an interest adverse to the Debtor. The Firm does jointly represent Johnson & Johnson in litigation matters related to certain talc-related claims.

9. Name and title of individual completing this form:

Andrew J. Lee, Shareholder

Dated: March 30, 2022

² This amount remains outstanding as of the Petition Date for work performed on behalf of Johnson & Johnson and the Debtor's predecessor, Johnson & Johnson Consumer, Inc., with respect to personal injury claims asserted against Johnson & Johnson and Johnson & Johnson Consumer, Inc., and now the Debtor, arising from the alleged use of certain talc-containing products. The Firm has billed those fees and expenses to Johnson & Johnson, consistent with the terms of its engagement with Johnson & Johnson.